

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

C.D.A., minor child, and Mr. A., his father;
and E.A.Q.A., minor child, and Mr. Q., his
father,

Plaintiffs,

v.

United States of America,

Defendant.

Civil Action No. 21-469

**JOINT STIPULATION AND PROPOSED ORDER
TO HOLD CASE IN ABEYANCE**

Subject to the Court's approval and by and through their counsel of record,
the parties stipulate as follows:

1. Plaintiffs filed this action under the Federal Tort Claims Act, 28 U.S.C. §§ 1346(b)(1), 2671, *et seq.*, and Alien Tort Statute, 28 U.S.C. § 1330, on February 1, 2021.

2. Defendant United States filed a Motion to Dismiss on April 26, 2021.

Plaintiffs' time to respond to the motion is currently July 9, 2021.

3. The United States, along with a group of counsel who are coordinating negotiations on behalf of plaintiffs and claimants, are engaged in a nationwide effort to settle district court cases and pending administrative tort claims arising from family separations at the U.S./Mexico border that occurred during the prior

administration. While significant progress has been made, due to the scale and complexity of the effort, additional time is needed to achieve a global resolution of these matters.

4. Accordingly, the parties have agreed to and seek an order from the Court holding this action in abeyance for a period of sixty (60) days, through September 7, 2021, during which the settlement discussions will continue.

A proposed Order is submitted contemporaneously to the instant motion.

Dated: July 6, 2021

Respectfully submitted,

/s/ Veronica Finkelstein
VERONICA J. FINKELSTEIN
Assistant United States Attorney

Counsel for the United States of America

/s/ Karen L. Hoffmann
Karen L. Hoffmann
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532 Walnut Street
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I, Karen Hoffmann, certify that on July 6, 2021, I served a copy of the Joint Stipulation and Proposed Order to Hold Case in Abeyance on all parties by CM/ECF.

Date: July 6, 2021

/s/ Karen L. Hoffmann
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